Enclosed are comments on the draft subbasin summaries for the Columbia Gorge and Inter-Mountain provinces. Given the time- frame and the draft nature of the summaries, the ISRP comments are informal and were not discussed by the entire ISRP. The comments are intended to inform further refinement of the Gorge and Inter-Mountain summaries for the August 16 deadline and the Mountain Columbia effort that has just begun. The ISRP's preliminary project report, due October 6, will include consensus reviewer comments on the plans and the proposals.

August 1, 2000

MEMORANDUM

TO: **Brian Allee, Tom Iverson, Neil Ward, Frank Young, Tom Geise (CBFWA)**
Bob Lohn, John Ogan, Doug Marker, Stacy Horton, Karl Weist (NWPPC)

FROM: **Erik Merrill and Rick Williams**

SUBJECT: **ISRP Comments on Draft Subbasin Summaries for the Columbia Gorge and Inter-Mountain Provinces**

In response to a request of CBFWA and Council staff, the ISRP and several peer review group members were asked to review and comment on the draft subbasin summaries for the Columbia Gorge and Inter-Mountain provinces. Given the timeframe and the draft nature of the summaries, the ISRP comments are informal and were not discussed by the entire ISRP. The comments are intended to inform further refinement of the Gorge and Inter-Mountain summaries for the August 16th deadline and the Mountain Columbia effort that has just begun. The ISRP's preliminary project report, due October 6, will include consensus reviewer comments on the plans and the proposals.

General Comments

General Impressions

It is apparent from the quality of the summaries that individuals who knew the area gave the summaries serious attention. Overall, the background and overview that the summaries for the Columbia Gorge and Intermountain subbasins provide are a big help in understanding the setting and the problems involved. They are useful working documents and will serve a useful role in the review process. The general uniformity of format and of approach to background material usefully depicts basin characteristics.

Limiting Factors

In the limiting factors section, the authors often give general statements with no references. For example, in the Lake Roosevelt summary it is stated that "Lake Roosevelt salmonid fish production is limited by tributary spawning/rearing habitat. Furthermore, natural recruitment of kokanee in Lake Roosevelt is limited since annual drawdowns expose shoreline redds. As a result, hatchery and net pen

production are used to overcome the production limitation." This all sounds very reasonable, but references should be given to original reports, data, or published papers, or they should say that there are no data, as they did in some places. Similarly, some of the ongoing and planned actions suffer from the same lack of presentation of how they know what they know (or what is simply assumed) about causes and consequences.

The statements of limiting factors were certainly effective in describing some very poor habitat and the consequent challenges faced in the region.

Fish and Wildlife Integration

Summaries should show more explicitly how fish resource problems, needs, and strategies/actions are integrated with wildlife problems, needs, and strategies/actions. The possibilities for integration seem apparent especially in regard to habitat matters at the watershed scale and in riparian areas. The fishery managers and wildlife managers should show that they work together—which would seem to be the mode in some of what is said in the text, and which they undoubtedly are doing in other cases.

Maps

The maps need labels for the features discussed in the text. A map does little good if the features such as dams, tributaries, cities, etc. that are important to the discussion are not identifiable on the map. Also, it would greatly help to have more detailed maps that identify each of the involved water bodies—and show the river-mile points referred to in the text. This would lessen reviewers' needs to track down other maps and grope through them. If the labels are too much for the e-figure (resolution is not the best), then features could be labeled with letters and a key or hard copies of the maps could be provided. The e-figure colored maps often had too low resolution to be useful (we understand the problems with file size and download times for maps with greater resolution), but some subbasin summaries, such as the Fifteenmile Creek Summary, provided very useful black and white line drawing maps throughout the summary to augment specific text discussions.

Final Summaries should include clear recommendations

All summaries did not have concluding recommendations. Hopefully, the authors plan to follow the informative, descriptive text with an evaluation that comes to some clear recommendations. Some outlines showed it.

Format

The subbasin description now falls under the fish and wildlife heading. It seems more logical to have the subbasin description as a separate initial section followed by fish, wildlife, etc.

A general common outline seems to have been used, but it might be used even more strictly. All of us will be able to find things more easily if they are in the same places in every summary.

Approach to writing the summaries

Authors should reread the documents from the perspective of independent reviewers before finalizing them. The summaries should demonstrate that alternatives to recommended or ongoing actions have been or are being considered. At times, it appears they are focused on justifying the need for the specific set of projects and management actions already funded. Although that is a component of the summary, they might better focus on the big picture and describe how the ongoing activities fit in.

As an example of how this might be approached, consider the use of flow chart (see next page) in the summary's finals section on Subbasin Management to show direct linkages between subbasin goals and objectives, limiting factors, proposed strategies, and projects (identifying both continuing and new projects, as well as factors not presently addressed by any projects).

Comments on Specific Summaries
Intermountain Province

Lake Rufus Woods Subbasin

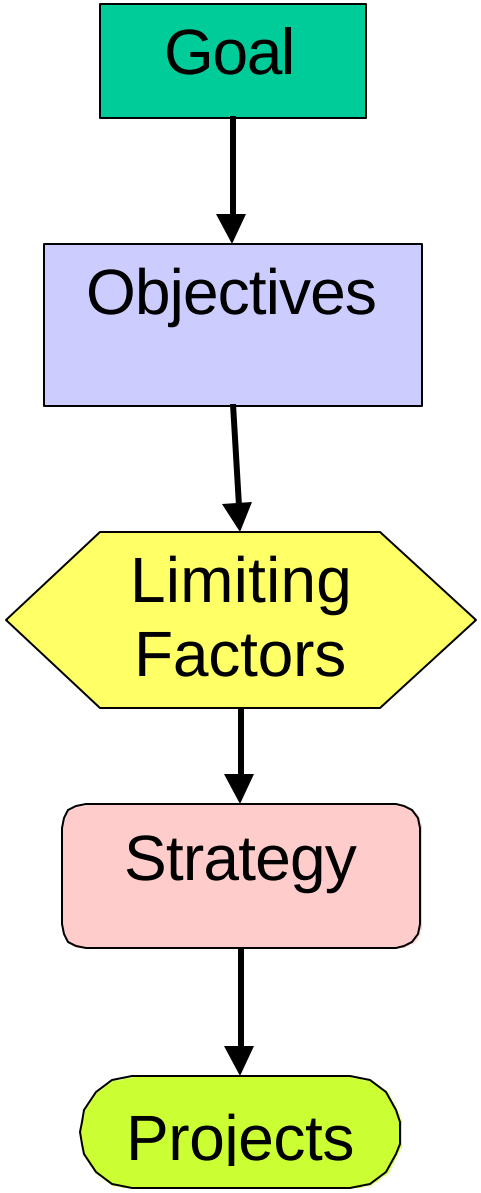
The Lake Rufus Woods Subbasin summary might serve as a model for the other Inter-Mountain summaries. A concern for an ecosystem approach pervades the summary. Relationships between the various basin attributes, including its biotic communities, are evident. Note that, for example, the fish resource is presented in terms of a multi-species community via statistics (as limited as the author states they are) and narrative description. As surveys become even more thorough and extensive, this could be expanded upon.

The material on limiting factors is informative and demonstrates knowledge of various important aspects of the situation---or in other cases where the author (honestly) admits existence of inadequate information, insightful awareness of probable limiting factors are shown. The distinction between fact and (justified) speculation is clear. Thus, important matters to either act on or investigate are identified.

Various of the comments on vegetation in the wildlife habitat sections (e.g., problems with reed canary grass) would also seem to hold implications for fish habitat, and these connections, if true, could be drawn in redrafting. In other words, the awareness of vegetational factors (and of human-generated harm in that respect) such as is evident in wildlife sections should be carried over into fish (aquatic) sections.

The goals and objectives are excellent, and the system of strategies toward achieving them seems very well thought out and is clearly stated. This part, especially, was a real pleasure to read. Given this underpinning, the management should become more and more effective as it builds and adapts---if continuities of outlook, administration, and personnel prevail. Note that each objective includes a date, and that at least two of the objectives (1 and 3) state measurable desired results (it would be even better if they all did). Note also that each of the strategies is stated in informative general terms, often

followed by a set of specific actions. An action set often embodies a diversity of approaches or at least of considerations in applying one approach, rather than hammering away at a supposed panacea.



Restore fish runs; maintain genetic integrity

Return 5,000 spring chinook
Return 2,700 summer steelhead

low abundance, water quality in lower river (temperature and sedimentation), passage problems at culverts and falls (late summer)

Increase abundance ***Allow passage*** ***Restore riparian***

Nat Prod Art. Prod. Build Fishway Fencing Exclosure

It would seem to be better if the objectives and strategies regarding riverine fish habitat problems (vaguely acknowledged elsewhere in the aquatic parts of the document to be major) could be more specific. Although the managers may regard fish habitat mainly as appropriate for investigation at this stage (e.g., fish objectives 4 and 6), and therefore maybe more specificity is not yet in order, they must have some pretty good observations impressions about what sorts of actions have damaged the streams. At least these observations should be stated (see San Poil R. Subbasin summary). On p. 13, it says that habitat inventories have identified habitat "parameters" that likely limit salmonid production in Nespelem River tributaries. What are these "parameters"?

The emphasis on a watershed approach and the remark in fish strategy 6.2, "utilize natural processes prior to technological 'fixes'," are particularly encouraging that the program will develop in effective directions.

The present BPA projects in the subbasin do not seem to meet anywhere near all the fish-related goals, objectives, and strategies contained in the summary.

The list of 35 (!) fish and wildlife needs in this subbasin is very interesting. Awareness, insights, and ideas abound. It would help to clarify matters for reviewers and others (and further develop the program) if the list were reorganized into categories.

The Lake Rufus Woods Subbasin program deserves special attention and support in developing along paths outlined in the draft summary.

San Poil River Subbasin

The general statements on fish habitat problems and their causes (p. 7-8) and statements in that regard about limiting factors (p. 9) are helpful in understanding the situation.

The "strategies" could be better presented. Each strategy should be thought out well to match its objective, then stated as such and followed by a list of *actions* that will be taken to carry out the strategy.

Much greater emphasis on providing immediate fishery opportunity via stocking than on sustained, long-term improvement via habitat restoration is evident, but the one objective (no. 8) concerning habitat is comprehensive and embodies sound aspects.

Spokane River Subbasin

This is a fairly thorough summary. The content apparently benefits from the watershed assessments that were done. The geographical situation confuses the outside reviewer. Maps are needed that identify the places and features referred to. Latah Creek—is this the same as Hangman Creek? Where is Spokane Falls? Is Post Falls in Washington or Idaho? Monroe Street Dam?—where's Monroe Street?

The section on goals, objectives and strategies is not as well developed as it could be. The fishery objectives are few and, except for number 1, too generally stated (no measurable results or target date identified). As in the San Poil summary, the "strategies" could be better presented.

It is nice to see fish needs listed separately from wildlife needs. This organization makes things clear. Connections between the two categories could be made explicit, however.

None of the present BPA projects shown for the subbasin seems to cover the needs for attention to fish habitat that the document reveals.

Lake Roosevelt Subbasin

This contains various good aspects but is the most problematic draft summary of those for the province. Human activities that have degraded habitat are stated, and that recognition is an important step. The results of the Lake Roosevelt kokanee stocking program have been far less than impressive (p. 7), and the draft reveals concern for conserving the native population.

It is nice to see the Banks Lake stocking record (Table 2), but it should be organized (segregated by species, etc.) so as to reveal possible trends and otherwise make the data more useful.

Stocking of 0.6 to 1.2 million kokanee in Banks Lake looks like it has been a failure (p. 10). Why is it then that "current management calls for" stocking 1 million of them annually?

The goal statement (p. 32) is: "The overall subbasin goal is to manage the myriad of native and non-native habitats and associated species to provide fish and wildlife harvest opportunities in the Lake Roosevelt Subbasin, which include many area lakes and their subbasins used to achieve on and off-site mitigation for the loss on [sic] anadromous fish." The 53-word statement expresses 5 or 6 thoughts and could be made clearer by eliminating extraneous material, e.g., by referring to the subbasin but once and moving a subsidiary thought (mitigation) to a follow-up sentence. More importantly, the emphasis is misplaced by saying that the goal is "to manage." This (as the authors undoubtedly did not intend) is making an activity into a goal. The goal should be the beneficial *outcome*, not the management itself. Compare the Lake Rufus Woods goal statement: "Maintain viable populations (numbers and distribution of reproductive individuals) of native and non-native species of fish and wildlife, and their supporting habitats, while providing sufficient numbers to meet cultural, subsistence and recreational needs." This statement is 33 words and expresses two clear main thoughts (maintaining fish populations and providing for human use) and three subsidiary thoughts. The Lake Rufus Woods goals are the results (viable fish populations and benefits to people), rather than the activities involved in achieving them. The requisite activities are covered in the statements on objectives, strategies, and actions.

Much the same comments as those in the Spokane River Subbasin summary pertaining to objective and strategy statements apply to this subbasin's summary.

Strategy 19 for Moses Lake (p. 41) is "enforcement of illegal harvest" (and maybe that phrase is used elsewhere, as well). I'm sure that's not what was meant.

The reviewers realize that the major and longstanding "demands" on the fishery managers here involve providing as many fish as possible as quickly as possible to offset loss of the anadromous runs that the dams destroyed. Stocking artificially produced fish is therefore the main thrust of this subbasin's management. The program would be strengthened, however, if greatly increased effort were addressed to the stream habitat problems that the summary brings out. The summary should more definitely state what the managers will do to restore stream habitat for fish.

Columbia Gorge Province

We looked briefly at the Hood River, Fifteenmile, and Klickitat Subbasin Summaries. All were well written and benefited from the structured and consistent format provided by CBFWF. For all, the background information sections on subbasin description, fish and wildlife status, and limiting factors were very informative. As noted above, more and better quality maps with relevant features noted, would assist the reader greatly. These sections would also benefit from more thorough documentation of the source material for many of the rather sweeping statements on both past and current status of fish and wildlife populations and habitat conditions. Much of the source material may be quite familiar to those working within the subbasin, but it needs to be more apparent to readers.

Brief Specific Comments

Hood River Subbasin Summary

The Hood River Subbasin Summary seems particularly well prepared and may serve (along with others noted above) as a model for future summary preparations.

In the section on Fish Objectives (Page 32), I did not understand why spawning escapement goals differed so much among stocks. For example, they look to be about 22% of the returning spring chinook run, while winter steelhead escapement is planned for about 50% of the run, and summer steelhead for roughly 35% of the run.

Klickitat River Subbasin Summary

Again, the background information in the Klickitat Summary was very informative. We were concerned after reading the limiting factors section, however, that the summary (and related strategies and projects) appeared to place too little emphasis on aggressively addressing the passage and sedimentation problems and too great an emphasis on the artificial production component. Long-term sustainable increases in production in most subbasins are going to come from relaxing production constraints

imposed by existing limiting factors within and outside the subbasin. Nevertheless, artificial production activities may have an important role to play in increasing abundance in the near-term.

Fifteenmile Creek Subbasin Summary

Introductory information in the Fifteenmile Creek Subbasin Summary was very informative, as were the various maps used to illustrate specific points. In many ways, the Fifteenmile Creek Subbasin program is a simple one, as it is focused almost entirely on winter run steelhead. In other ways it is quite complex due to the large amount of privately owned land and the extensive degradation resulting from decades of agricultural impacts.

In terms of initial presentation and overview, the Fifteenmile Creek Subbasin Summary is very well done. A closer reading of the summary is troubling however, as a substantial amount of work on both habitat and winter steelhead has occurred in the basin over the last 15 years, yet very little quantitative data or summaries are presented in the Subbasin Summary for either habitat conditions or particularly for winter steelhead demographics or life history. The Fish and Wildlife Needs Section (pp. 33-36) presents a laudable list of information needs, yet much of the information listed as needed really represents background or baseline information that one presumes has been collected of the last 15 years or so, in one form or another. Are the data gaps and lack of information as great in the Fifteenmile subbasin as the summary seems to suggest?

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